

Message

From: Hanley, Valerie@DTSC [Valerie.Hanley@dtsc.ca.gov]
Sent: 3/27/2019 4:40:11 PM
To: Fennessy, Christopher [christopher.fennessy@rocket.com]; Stralka, Daniel [Stralka.Daniel@epa.gov]
CC: Keller, Lynn [Keller.Lynn@epa.gov]; ROJAS-MICKELSON, DAEWON [rojas-mickelson.daewon@epa.gov]; MacDonald, Alex@Waterboards [Alex.MacDonald@waterboards.ca.gov]; Rohrer, Jim@DTSC [Jim.Rohrer@dtsc.ca.gov]
Subject: Re: Aerojet Groundwater and Vapor Management Program

I can't do Thursday morning and the afternoon would be tight.

Valerie Mitchell Hanley, PhD
Staff Toxicologist
Human and Ecological Risk Office
Department of Toxic Substances Control

From: Fennessy, Christopher <christopher.fennessy@rocket.com>
Sent: Wednesday, March 27, 2019 9:34 AM
To: stralka.daniel@epa.gov; Hanley, Valerie@DTSC
Cc: Keller, Lynn (Keller.Lynn@epa.gov); rojas-mickelson.daewon@epa.gov; MacDonald, Alex@Waterboards; Rohrer, Jim@DTSC
Subject: RE: Aerojet Groundwater and Vapor Management Program

Hi Everyone – I am following up on the following e-mail. Can you please provide your availability for a short call during the following days/times:

Today, March 27 1pm-4pm
Thurs, March 28 9am-1200
Thurs, March 28 1pm-4pm
Fri, March 29 9am-1200
Fri, March 29 1pm-4pm

Thanks, Chris

Christopher M. Fennessy, P.E.
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Engineering Manager, Site Remediation
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Email: Christopher.Fennessy@Rocket.com

From: Fennessy, Christopher
Sent: Saturday, March 23, 2019 6:06 PM
To: Stralka.Daniel@epa.gov; Valerie.Hanley@dtsc.ca.gov
Cc: Keller, Lynn (Keller.Lynn@epa.gov); rojas-mickelson.daewon@epa.gov; MacDonald, Alex@Waterboards (Alex.MacDonald@waterboards.ca.gov); jim.rohrer@dtsc.ca.gov
Subject: Aerojet Groundwater and Vapor Management Program

Hi Dan and Valerie - During our Technical meeting yesterday, Daewon and Jim suggested I send you some specific information about our plan. We are attempting to pin down the trigger levels that result in an action. Since TCE is the primary COC for VI at Aerojet, this discussion is based upon TCE.

Based upon screening levels, the 10⁻⁶ to 10⁻⁴ risk management range for TCE in sub-slab samples is 16ug/m³ to 1600ug/m³. However, the hazard index of 1.0 is 70ug/m³, so the decision range is reduced to 16ug/m³ to 70ug/m³. Typically, when the concentration reaches or exceeds this range, an investigation is required to determine if vapor mitigation is necessary.

During the Area 40 vapor mitigation discussions, we concluded that passive vapor mitigation systems provide at least a 1 order of magnitude protection (meaning the sub slab concentration could be between 160-700ug/m³) and an active vapor mitigation system provides at least a 2 order of magnitude protection (meaning the sub slab concentration could be between 1,600-7,000ug/m³).

In the Glenborough development, all habitable structures will be equipped with passive vapor mitigation systems (minimum requirement is vapor barrier and slotted pipe to vent vapors beneath the slab). This is regardless of TCE concentration in vapor beneath the community.

Prior to occupancy, the vapor mitigation systems will be verified that they were installed correctly (eg smoke test and dP measurements in house and VM system) and functioning as planned. A report will be produced and stamped by a licensed engineer in the State of California.

Aerojet desires to establish a monitoring program that does not require entry onto the owners property after initial construction (eg no sub-slab sampling, no soil vapor sampling, no indoor air sampling).

In order to achieve this, we are proposing the following conservative screening levels as trigger levels:

After sending my last email regarding different scenarios, it sounded like most people are supportive of Scenario 2 (co-located gw and vapor wells). The following proposed trigger levels are based upon Scenario 2.

Concentration of TCE in sentinel groundwater well that triggers installation of co-located downgradient sentinel groundwater wells and sentinel vapor wells (these would be within the community) = 5ug/L

Soil vapor concentration in sentinel vapor wells upgradient of community which triggers installation of vapor wells in community = 16ug/m³

Soil vapor concentration in community vapor well that triggers switching to active = 120ug/m³ (this is below the concentration discussed for Area 40)

Soil vapor concentration in community vapor well that triggers submittal of plan to reduce concentrations of vapors in community = 160ug/m³ (this is an order of magnitude below the concentration discussed for Area 40 that an active vapor mitigation system would allow)

Soil vapor concentration in community vapor well that triggers implementation of plan = 350ug/m³ (although the system would already be active, this concentration is within the range that a passive system is protective, as discussed for Area 40)

Please provide your thoughts on these trigger levels. I would like to schedule a call to discuss your thoughts. Please provide your availability for a 30 min conf call during the following days/times:

Weds, March 27 9am-1200

Weds, March 27 1pm-4pm

Thurs, March 28 9am-1200

Thurs, March 28 1pm-4pm

Fri, March 29 9am-1200

Fri, March 29 1pm-4pm

Thanks! Chris

Sent with BlackBerry Work (www.blackberry.com)